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March 18, 2024

VIA ECF

Hon. Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 23A
New York, New York 10007

Re: *The New York Times Company v. Microsoft Corporation, et al.*,
Case No.: 23-cv-11195-SHS

Dear Judge Stein:

I write on behalf of Plaintiff, The New York Times Company (“The Times”), pursuant to Rule 2.F of Your Honor’s Individual Practices. The Times respectfully requests oral argument on Microsoft Corporation’s partial motion to dismiss. Dkt. 64. The Times defers to the Court but believes it makes sense to hear argument on this motion concurrent with the OpenAI Defendants’ partial motion to dismiss (Dkt. 51), which raises overlapping arguments. For both motions, The Times believes that oral argument will assist the Court in separating Defendants’ improper factual assertions from The Times’s well-pled allegations.

Respectfully submitted,

/s/ Ian B. Crosby
Ian B. Crosby

cc: All Counsel of Record (via ECF)